

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

IN RE:)
)
KANSAS CITY UNITED METHODIST) Chapter 11
RETIREMENT HOME, INC., d/b/a)
KINGSWOOD SENIOR LIVING) Case No. 21-41049-11-CAN
COMMUNITY,)
)
Debtor.)

**NOTICE OF DESIGNATION AS
COMPLEX CHAPTER 11 BANKRUPTCY CASE**

This bankruptcy case was filed on August 18, 2021. Debtor as the undersigned party in interest believes that this case qualifies under L.R. 1002-2 as a Complex Chapter 11 Bankruptcy Case because:

- X There is a need for emergency consideration of the following “first day” motions:
- (1) Motion for Entry of Interim and Final Orders Authorizing Use of Cash Collateral and Providing Adequate Protection (interim hearing only);
 - (2) Motion for Authorization to Pay Prepetition Claims of Critical Vendors and Contractors;
 - (3) Application for Approval of Payment of Prepetition Payroll (to the limit provided by § 507);
 - (4) Motion for Order Authorizing Maintenance of Cash Management System and Continued Use of Certain Existing Bank Accounts, Investment and Deposit Practices, and Certain Business Forms;
 - (5) Application for Determination of Adequate Assurance of Payment to Utilities;
 - (6) Motion for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Patient Information;

- (7) Motion for Entry of Order Authorizing Debtor to (I) Escrow Post-Petition Entrance Fees and (II) Refund Certain Resident Entrance Fees; and
- (8) Motion for Entry of an Order Authorizing the Debtor to Assume the Plan Support Agreement.

 X The Debtor has total debt of more than \$50 million and unsecured non-priority debt of more than \$4 million;

 X There are more than 400 parties in interest in this case; and

 X Claims against the Debtor are publicly traded.

Respectfully submitted,

McDOWELL, RICE, SMITH & BUCHANAN

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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

On August 18, 2021, the above and foregoing was filed with the United States Bankruptcy Court for the Western District of Missouri using the CM/ECF Electronic court filing system with notification to all parties requesting electronic notification as well as service via e-mail or fax and United States Mail, postage prepaid, to:

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